

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

\_\_\_\_\_  
In re:

Chapter 11  
Case No. 22-40809-NHL

Zen Restoration Inc.

Debtor  
\_\_\_\_\_  
X

AFFIRMATION

Vincent M. Lentini, Esq. (“VML”) being duly sworn deposes and says under penalty of perjury as follows:

1. I am counsel for the debtor.
2. Since I became involved in this case of June 14, 2023, I have reached out to several entities that I believe would be interested in providing financing to allow the debtor to satisfy its secured creditors and assist in proposing a confirmable chapter 11 plan.
3. Annexed hereto as “Exhibit “A” is a financing term sheet from GP Capital in a sum sufficient to satisfy all secured creditors herein and to provide sufficient capital for the debtor to be able to propose a confirmable plan of reorganization.
4. Annexed as Exhibit “B” is a financing term sheet from GP Capital for properties which the debtor’s principal owns and is vital to the debtor’s operations which would allow for payment of those secured creditors and a discontinuance of the foreclosure actions.
5. I provide the above as opposition to the pending motion for relief from stay and ask that the court adjourn said motion 60 days to allow me to further explore this and bring on the appropriate motion to approve the financing.
6. No prior request for the relief sought herein has been made to this or any other court.

WHEREFORE, the Debtor respectfully requests that the relief sought herein be granted in its entirety.

Dated: July 14, 2023

S/  
Vincent M. Lentini, Esq.  
Attorney for Debtor  
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